

EXHIBIT A

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO *et al.*,

Debtors.¹

PROMESA Title III

Case No. 17 BK 3283-LTS

(Jointly Administered)

**[PROPOSED] ORDER GRANTING THE URGENT MOTION OF AMBAC
ASSURANCE CORPORATION, ASSURED GUARANTY CORP., ASSURED
GUARANTY MUNICIPAL CORP., AND FINANCIAL GUARANTY INSURANCE
COMPANY TO COMPEL PRODUCTION OF DOCUMENTS RELATING TO THE
PRELIMINARY HEARING ON THE CCDA AND PRIFA LIFT-STAY MOTIONS**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

THIS MATTER is before the Court on an Urgent Motion filed by Ambac Assurance Corporation, Assured Guaranty Corp., Assured Guaranty Municipal Corp., and Financial Guaranty Insurance Company (collectively, “Movants”) to compel production of documents relating to the preliminary hearing on the CCDA and PRIFA lift-stay motions by the Federal Oversight and Management Board for Puerto Rico (the “Oversight Board”) and the Autoridad de Asesoría Financiera y Agencia Fiscal de Puerto Rico (“AAFAF” and, together with the Oversight Board, the “Government Parties”). The Urgent Motion seeks an order compelling the Government Parties to produce documents responsive to Movants’ requests, as articulated and defined in the Urgent Motion, and produce deposition witness(es).

UPON CONSIDERATION of the Urgent Motion, the relevant portions of the docket, and being otherwise fully advised in the matter it is hereby **ORDERED** that:

1. The Urgent Motion is **GRANTED** as set forth herein.
2. The Government Parties shall produce documents, dated January 1, 2015 to present, responsive to Movants’ requests:
 - Communications to which the Commonwealth, PRIFA, or rum producers are a party, relating to the Rum Taxes, the flow of funds for PRIFA bonds, and/or the use of Rum Taxes. (Responsive to PRIFA Request No. 3)
 - Communications to which the Commonwealth, the Tourism Company, CCDA and/or GDB is a party relating to occupancy tax revenues, the flow of funds for CCDA, or the retention and use of occupancy tax revenues. (Responsive to CCDA Request No. 3)
 - Documents sufficient to show the terms, scope, and effects of purported restrictions placed on CCDA- and PRIFA-related funds, including but not limited to those described as “restricted” in the Commonwealth’s “Summary of Cash Restriction Analysis” dated October 2, 2019. (Responsive to CCDA Request No. 6, PRIFA Request No. 8)
 - Account statements, transmittal information concerning transfers of pledged revenues, and account opening documents showing the legal title and registration of the accounts. (Responsive to CCDA Request Nos. 1-2, PRIFA Request Nos. 1-2)

3. The Government Parties shall produce deposition witness(es), pursuant to Federal Rule of Civil Procedure 30(b)(6), competent to speak to the topics of discovery identified in *Order Granting Urgent Motion to Adjourn Hearing on Motions for Relief from the Automatic Stay and Extend Deadlines for Replies in Support of Motions for Relief from the Automatic Stay* [ECF No. 11057] (the “Adjournment Order”) and documents produced by the Government Parties.

Dated: _____, 2020

SO ORDERED:

Honorable Judith G. Dein
United States Magistrate Judge